

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
NESSA RISLEY, individually and on behalf of	:	
all others similarly situated,	:	
	:	
Plaintiff,	:	
	:	
v.	:	22-cv-02780-KPF
	:	
UNIVERSAL NAVIGATION INC. d/b/a	:	
UNISWAP LABS, HAYDEN Z. ADAMS,	:	
PARADIGM OPERATIONS LP, AH CAPITAL	:	
MANAGEMENT, L.L.C. d/b/a ANDREESSEN	:	
HOROWITZ, and UNION SQUARE	:	
VENTURES, LLC,	:	
	:	
Defendants.	:	
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STIPULATION AND [PROPOSED] ORDER
EXTENDING TIME TO RESPOND TO COMPLAINT

WHEREAS, on April 4, 2022, Nessa Risley (“Plaintiff”), individually and on behalf of all others similarly situated, filed a class action complaint against Universal Navigation Inc. d/b/a Uniswap Labs, Hayden Z. Adams, Paradigm Operations LP, AH Capital Management, L.L.C. d/b/a Andreessen Horowitz, and Union Square Ventures, LLC (collectively, “Defendants”) in the above-captioned case alleging violations of the Securities Act of 1933 and the Securities Exchange Act of 1934;

WHEREAS, the action is subject to the Private Securities Litigation Reform Act of 1995 (the “PSLRA”);

WHEREAS, in accordance with the PSLRA, counsel for Plaintiff published notice of the pendency of the action on April 8, 2022;

WHEREAS, motions for the appointment of lead plaintiff(s) are due on June 7, 2022;

WHEREAS, the Court issued an order (the “Order”) scheduling a conference to be held on July 29, 2022, to consider any motions for appointment of lead plaintiff and lead counsel and for consolidation;

WHEREAS, in accordance with the Order, counsel for plaintiff has served a copy of the Order on each of the Defendants through their respective counsel;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by counsel for the parties listed below, that:

1. Defendants are under no current obligation to answer or otherwise respond to the complaint and, unless otherwise ordered by the Court, Defendants may defer any answer or other response until after an order is entered regarding the Court’s appointment of a Lead Plaintiff and approval of Lead Plaintiff’s selection of Lead Counsel pursuant to the PSLRA.

2. No more than fifteen (15) days after the Lead Plaintiff has been appointed and Lead Counsel approved by the Court in accordance with the PSLRA, counsel for Defendants and Lead Counsel shall confer and submit a proposed schedule for the filing of a consolidated or amended complaint and Defendants’ response thereto or, alternatively, if Lead Plaintiff confirms that she does not intend to further amend the complaint in this action at that time, then the parties shall confer and submit a proposed schedule for the filing of Defendants’ response to the operative complaint.

3. By entering into this stipulation, Defendants do not waive any defenses that otherwise could be asserted through a motion pursuant to Fed. R. Civ. P. 12 or otherwise.

Dated: New York, New York
April 21, 2022

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Attorneys for Plaintiff Nessa Risley

Dated: New York, New York
April 21, 2022

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*Attorneys for Defendants Universal Navigation, Inc.,
Hayden Z. Adams and Union Square Ventures, LLC*

Dated: New York, New York
April 21, 2022

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Dated: New York, New York
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Attorneys for Defendant Paradigm Operations LP

SO ORDERED this _____ day of _____, 2022.

THE HONORABLE KATHERINE POLK FAILLA
United States District Judge